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April 5, 2002

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 10/10/01 BY 60322
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND
DEPUTY

The Hon. Benson Everett Legg
United States District Judge
United States District Court for the
District of Maryland
101 West Lombard Street
Baltimore, MD 21201

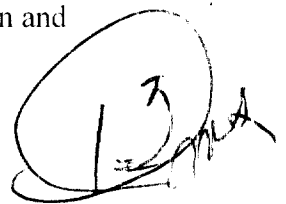
**Re: Valtrina Gloyd, et. al., v. Mark Alan Wech, et. al.
Civil No. L-02-108**

Dear Judge Legg:

The parties have received an Order of Reference to United States District Magistrate Judge James K. Bredar for purposes of settlement. The parties have been advised that we are scheduled to participate in settlement discussions with Judge Bredar on May 3, 2002. Undersigned counsel for the parties have conferred regarding the upcoming settlement conference and write to propose a brief extension of Rule 26(a)(2) expert witness deadlines. Currently, the plaintiff is scheduled to disclose Rule 26(a)(2) expert witnesses by May 13, 2002, defendants are scheduled to disclose Rule 26(a)(2) expert witnesses by June 12, 2002 and plaintiff is required to disclose rebuttal witnesses on June 26, 2002. The Discovery cut-off Status Report Deadline is July 29, 2002, which the parties do not seek to modify.

The plaintiff has already submitted a demand letter to defendants, which Ms. Silver has communicated to the relevant insurance companies. While the parties have also propounded written discovery, the parties are actively pursuing settlement negotiations. Thus, given the upcoming mediation and that the parties have already commenced settlement negotiations, the parties agree and propose to extend the deadlines in which plaintiff and defendants are required to disclose their respective expert witnesses pursuant to Rule 26(a)(2), without changing the Discovery cut-off and Status Report Deadline. The parties believe that it is in the parties' respective best interests to try and resolve the case without engaging in costly deposition and

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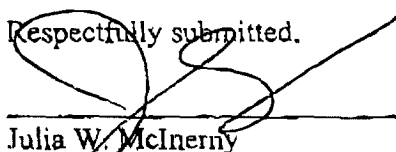
expert witness discovery, which may prove unnecessary if the case resolves on or before May 3, 2002. Undersigned counsel propose the following schedule, which they believe is reasonable and can be accomplished before the July 29, 2002 Discovery cut-off and Status Report Deadline.

Plaintiff's Rule 26(a)(2) disclosures re: experts	June 3, 2002
Defendants' Rule 26(a)(2) disclosures re: experts	July 3, 2002
Plaintiff's Rule 26(a)(2) rebuttal disclosures re: experts	July 17, 2002

Under this proposal, the Discovery Deadline and submission of Status Report remains the same at July 29, 2002. On behalf of both parties, thank you for your consideration of this matter.

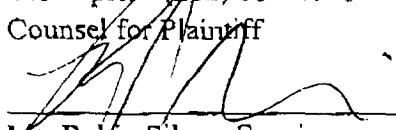
Respectfully submitted.

4/5/02
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Date



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Counsel for Defendants

Granted this 19TH day of April 2002.



Benson Everett Legg
United States District Judge

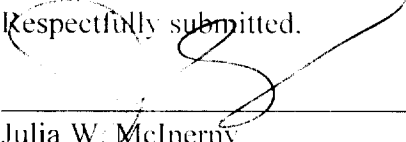
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Date

Respectfully submitted,



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Granted this _____ day of April 2002.

Benson Everett Legg
United States District Judge